**County Administrator**

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P.O. Box 189
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www.stjosephcountymi.org

Transmittal Letter

January 15, 2014

Environmental Management Support, Inc.

Attn: Mr. Don West

8601 Georgia Avenue, Suite 500

Silver Spring, MD 20910

Re: US EPA Brownfield Petroleum Assessment Grant Proposal, St. Joseph County, Michigan

Dear Mr. West:

St. Joseph County, Michigan appreciates the opportunity to submit this proposal for a \$200,000 Community-wide Brownfield Petroleum Assessment Grant. St. Joseph County is located in southwest Michigan and has a population of 60,796 (US Census Bureau, 2012 estimate). The County includes 2 cities, six villages, and 16 townships. Its 525 square miles includes 1,033 farms covering 215,425 acres (2007 Census of Agriculture, US Department of Agriculture). St. Joseph County has two business centers (Sturgis and Three Rivers) located on major transportation routes (US 12 and US 131). The City of Sturgis includes a downtown corridor along Chicago Road (US 12) that will serve as the target community's specific target area.

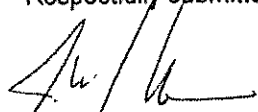
The primary focus for the grant is on several vacant and underutilized properties in and around the City of Sturgis Downtown Development Authority footprint. Previous inventory efforts have identified several historic gas stations on main thoroughfares near the downtown. Assessment funds will provide a means of improving the use of the properties while supporting the goals of local planning for a vibrant, healthy, and economically viable downtown. There have been multiple efforts that successfully engaged the community's participation. Various plans and visions have highlighted the importance of the entryways to the community's core downtown area. We seek to utilize the assessment funds to support the reuse of vacated and underutilized properties in the target area, offer development opportunities and job growth, and return properties to the tax rolls. Without assessment funds to support the redevelopment, the properties are likely to remain vacant with uncontrolled contamination that impair public health and have detrimental impacts on the social and economic welfare of nearby residents.

St. Joseph County lacks adequate funds to assist in the revitalization of the main corridor and gateways into the City of Sturgis. It is an area where brownfields have disproportionately impacted the health and welfare of sensitive populations and threaten to contaminate soil, groundwater, and air quality. The State similarly lacks sufficient funds, and such areas are highly unlikely to be a priority to the State. Thus the responsibility for changing the face of these properties falls to the local units of government. Serious economic impacts throughout the State of Michigan have dramatically impacted the ability of local governments to address such challenges. Total assessed value of County property decreased 3.35% (\$82 Million) from 2011 to 2012. The City of Sturgis lost assessed value of \$24 Million (8.97% decrease) – dramatically affecting the tax revenues of the County and Cities. State programs to support brownfield redevelopment are underfunded and remaining funds are dwindling and often made available only to larger cities such as Detroit. This leaves a rural community such as St. Joseph County with no resources to address issues related to blighted and abandoned properties.

The County has proficient resources available to facilitate a successful grant program. Project partners including Southwest Michigan First and the St. Joseph County Brownfield Redevelopment Authority (SJBRA) have managed assessment grants from 2004, 2007, and 2007. The resulting benefits of their efforts was over \$86.6 million in investment into Brownfield sites. Five hundred twenty-nine jobs were retained while 645 were created. We expect to continue to see similar positive outcomes as the County is awarded this assessment grant. The County has an established, well-functioning brownfield program that continues to need resources to address the contaminated sites in the County. The grant will help St. Joseph County continue to address the numerous brownfields that are inhibiting redevelopment opportunities and negatively impacting the environment, residents' health, and the County's image. The funds will provide incentives for businesses to invest in the core community area by redeveloping its brownfields.

St. Joseph County views the grant as a vital tool to continue the success the St. Joseph County Brownfield Redevelopment Authority has achieved in alleviating brownfield blight. We thank you for your time and consideration of our grant request. Upon your review, if you have any questions or require additional information, please do not hesitate to contact us.

Respectfully submitted,



Pat Yoder
Administrator / Controller

a. Applicant: St. Joseph County Michigan
PO Box 189
Centreville, Michigan 49032

b. DUNS: 074300815

c. Funding Requested

i. Grant Type: Assessment Grant

ii. Federal Funds Requested:
\$200,000 petroleum

iii. Contamination: Petroleum

iv. Target Area: Community-wide

d. Location: St. Joseph County

e. Site Specific: Not Applicable

f. Contacts:

i. Project Director Cathy Knapp

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ii. Chief Executive Officer: Pat Yoder

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g. Date Submitted: January 15, 2014

h. Project Period: J 2014 to J 2017

i. Population: 10,967 (City of Sturgis Target Area
– 2012 Estimate)

j. Other Factors Checklist: Attached

1. Community Need

a. Targeted Community and Brownfields

i. Targeted Community Description

St. Joseph County is located in southwest Michigan on the Michigan/Indiana border, approximately 150 miles from both Chicago and Detroit. Our **rural County** is intersected east to west by US Highway 12 and north to south by US Highway 131. It is two miles north of I-80/90, the longest interstate highway in the United States. Totalling 503 square miles, St. Joseph is Michigan's 12th smallest county and consists of two cities (Sturgis and Three Rivers), six villages, and 16 townships. St. Joseph County has more irrigated land than any other County east of the Mississippi River – supporting St. Joseph County's status as the "seed corn capital of the world" with two large seed processing facilities, Lay's Potato Chip manufacturer, leading milk solids exporter to overseas markets, and dozens of other agribusiness and food-related industries. Preservation of quality farmland by sustaining development within established core urban areas has always been one of the County's primary goals. Development pressures in greenspaces in the County not only detract from urban redevelopment but place additional financial pressures on farmland and the underlying cost of raw materials for the County's food and agribusiness segment – a significant part of the local economy. Thus preservation of greenspace and farmland is not just an aesthetic objective – it is a critical economic goal for the County.

One of the areas where we are combatting urban sprawl is within the City of Sturgis. This small community (population of 10,967) is experiencing growth due in part to its proximity (less than two miles) to Interstate 80. The types of development interest include restaurants, service businesses, retail, etc., that want to be located on main thoroughfares. The main corridors in Sturgis (US-12 and M-66) are ideal locations for these new developments; however, they contain several brownfield properties that have deterred development. Old gasoline service stations, former car wash facilities, oil change operations, former auto repair operations, used car lots, and other properties with suspected petroleum contamination have deterred development in this corridor and forced new development outside of the City limits. Thus, to better prepare these main corridors for development, and stem urban sprawl into neighboring agricultural land, we have targeted the main corridors in the City of Sturgis. The two main corridors in downtown Sturgis (Chicago Road US 12 / M-66) comprises our **target community** and is approximately a two-mile-long stretch of commercial development, including historic downtown Sturgis.

Without intervention, the development opportunities will migrate to the outskirts of the City, increasing urban sprawl and putting additional pressure on the City to support expanding infrastructure needs and municipal services. If development is not directed to the existing urbanized area, these former gasoline stations and automotive-related businesses linger and drag down the development potential of adjacent properties and the neighborhood.

The City of Sturgis is a small community and although it is the largest City in St. Joseph County, it lacks the resources to address the issue of environmentally contaminated properties in its jurisdiction. St. Joseph County, through its range of economic development services provided County-wide, has the expertise and experience to assist the City, as well as other municipalities in the County, with Brownfield redevelopment challenges.

ii. Demographic Information

	Targeted Community (Census Tracts: 0406/0407)	City of Sturgis	St. Joseph County	Michigan	National
Population	3,233 ⁵ /3,077 ⁵	10,967 ⁴	61,295 ⁵	9,876,184 ⁴	308,745,538 ¹
Unemployment	14.1% ⁵ /17.3% ⁵	13.1% ¹	17.5% ⁵	9.4% ⁸	7.2% ²
Poverty Rate	24.12% ⁵ /27.72% ⁵	22.03% ⁵	15.09% ⁵	14.8% ⁹	15.1% ³
Percent Minority	21.6% ⁵ /24.8% ⁵	19.45% ⁵	9.42% ⁵	19.8% ⁴	26.7% ¹
Median Household Income	\$33,113 ⁵ /\$34,671 ⁵	\$38,349 ⁴	\$44,392 ⁵	\$48,669 ⁴	\$49,445 ³
¹ 2010 US Census Data available at census.gov . ² Bureau of Labor Statistics available at bls.gov . ³ 2010 American Community Survey available at census.gov . ⁴ 2011 US Census Data Estimates available at census.gov . ⁵ Target Area Demographics available at www.usa.com . ⁶ Data is from 2010 American Community Survey http://www.census.gov/newsroom/releases/archives/income_wealth/cb11-157.html /Average from Census Tracts in Target Area ⁸ Data is from the Michigan Department of Technology, Management, and Budget August 2012 ⁹ www.usda.gov					

The Target Community (comprised of two census tracts: 0406/0407) has a small population of 6,310 with average poverty rates of 25.92% and an average median household income of \$33,865. Hispanic population groups make up a large minority population; 20.8% in census tract 0406 and 34.3% in census tract 0407. This is in part due to the robust manufacturing economy in the 1960s. The population of the target community is comprised of low-income individuals with median household incomes of \$33,113 in census tract 0406, and \$34,671 in census tract 0407. The numbers compared to the State of Michigan fare worse in categories such as percent minority, unemployment, and median household income; among some of the worst in the state. Many of those jobs have left the community and the urban neighborhood has seen high rates of unemployment and poverty as a result, leaving pockets of vacancy, and decreasing tax-base.

iii. Brownfields

According to the current Michigan Department of Environmental Quality (MDEQ) website, St. Joseph County has 50 documented 1994 Michigan Public Act 451 Part 201-listed sites where there has been a release of hazardous substances or petroleum. Sturgis has 14 of the Part 201-listed sites (Sites of Known Contamination), 21 Underground Storage Tank (UST) sites, and 12 Leaking Underground Storage Tank (LUST) sites (www.michigan.gov/degrd). The County completed a completed a Brownfield Inventory within the Targeted Community and identified over 60 sites where petroleum contamination may be present. These sites were identified using historic Sanborn Fire Insurance Maps, historic aerial photographs, and by evaluating previous uses. Site inspections reveal remnants (i.e., fuel ports, vents, elliptical scars in concrete from tank removal, asphalt patches, and vents pipes) at some of these sites. These past uses and features scare off potential developers due to the uncertain environmental condition of the properties. Many of these sites sit vacant, impacting development potential of the site and neighboring properties.

The targeted community includes the commercial frontage along these main corridors and the residential neighborhoods that are positioned directly adjacent to these brownfields. The sites have likely impacted soil and groundwater with petroleum compounds such as benzene, toluene, ethylbenzene, xylenes, semi-volatile organic compounds, lead, waste oil solvents including chlorinated solvents, PCBs, and other fuels. The potential contamination adversely impacts the environmental condition and welfare of this poorer, minority population residing in near proximity to the identified brownfields.

iv. Cumulative Environmental Issues

The target community is comprised of two state highways and is in proximity to Interstate 80. Air, light, and noise pollution from automobile and truck traffic all pose threats to the **target area**. The Corridor through Downtown Sturgis gets anywhere from 8,400 to 13,000 vehicles per day, which is rapidly accelerating the amount of nitrogen oxide, sulfur dioxide, and particulate matter in the atmosphere, and, thus, creating health risks to adjacent residential neighborhoods. Nitrogen oxide emissions and particulate matter from truck traffic cause various types of health problems including; cardiovascular diseases, cancer, respiratory illness, low birth weight, etc. See *Impacts on Target Community* for additional health effects. Particulate matter from exhaust creates adverse air quality conditions and has been linked to "increased hospitalizations, for asthma attacks, for children living near roads with heavy truck traffic, slowed lung growth in children and teenagers, low birth weight, and infant mortality. (www.stateoftheair.org; American Lung Association)

The Sturgis Diesel Plant (a power generation facility) is located at the west-end of the **target area**, and contributes emissions to the neighborhood.

The residents of Sturgis rely on groundwater for their drinking water supply. Five municipal water wells in the County have been abandoned due to the presence or threat of contamination. The cost of treating groundwater, accessing new water supplies, or replacing contaminated wells is prohibitive for a small, rural County like St. Joseph. The Michigan Department of Environmental Quality (MDEQ) Water Well Viewer identified 25 wells in the Sturgis target area with direct proximity to sources of contamination. Contaminated groundwater plumes in these target areas also have the potential to transport volatile chemicals and emit vapors through subsurface soils and into indoor spaces. Vapors may accumulate in occupied buildings, contaminate air quality and pose risks of chronic health effects from long-term exposure. We are aware of several situations where extensive groundwater contamination is emanating from the brownfield site and into a residential neighborhood.

b. Impacts on Targeted Community

The targeted community incorporates residential neighborhoods in addition to schools, and has the potential to negatively impact sensitive populations (minorities, women, children, and elderly persons) by exposing them to numerous contaminants through direct contact, airborne particulate inhalation, and vapor intrusion pathways. The largest population of sensitive individuals includes children (9.06% of the target area) under the age of 14 and the Hispanic population (27.6% of the target area). Short and long-term exposure to the contaminants causes damage to the central nervous system, damage to respiratory system, and increased cancer risk. According to the Michigan Department of Community Health, cancer is the second leading cause of death in St. Joseph County (25.5% according to Michigan Department of Community Health).

Target Areas	Suspected Contamination	Health Impacts ¹
-Chicago Road/U.S. 12	VOCs, Benzene, ethylbenzene, Xylene, Toluene, Semi-volatile organics, PCBs,	Damage to central nervous system and respiratory system, liver/kidney damage, dizziness. Increased cancer risks. Skin irritation

¹National Institute for Occupational Safety and Health (NIOSH) Pocket Guide to Chemical Hazards and ATSDR.

Petroleum vapors that may migrate via vapor intrusion pose additional risks to nearby residents who already suffer from respiratory problems. Approximately 91 hospitalizations for asthma related issues occurred in St. Joseph County in 2011 and 67.3 % of children on Medicaid that have been issued prescription medications take long-term control medication for asthma related issues each year (Asthma

Initiative of Michigan). With 51.6% of children in St. Joseph County are insured by Medicaid and numbers continuing to grow, the ability to receive and afford other health care options is not financially viable for low-income, unemployed, and poverty stricken residents. Thus, ensuring this population is not burdened by the additional exposures posed by Brownfields is valuable public health goal.

Children Ages 0-18 Insured by Medicaid ¹					
	2006	2007	2008	2009	2010
St. Joseph County	39.6%*	40.4%*	45.2%*	47.3%*	51.6%*
*Kids County Data Center					

	Three Rivers	Sturgis	St. Joseph Co.	Michigan	National
Children	28.5% ²	30% ²	25.5% ¹	23.2% ¹	23.7% ²
Children in Poverty	-	-	23.9% ³	25% ¹	21.6% ³
Elderly	12.0% ²	12.6% ²	15.1% ¹	14.1% ¹	13.3%
Hispanic	5.2% ²	22.8% ²	6.8% ²	4.5% ²	16.7% ²

¹Kids County Data Center

²U.S. Census Bureau (2010)

³USDA ERS Data

c. Financial Need

i. Economic Conditions

The decline in operational businesses in St. Joseph County has contributed to the creation of Brownfield sites and adverse economic impact including higher unemployment rates, increased poverty rates, and low median household income. A primary concern to St. Joseph County is job creation and redevelopment, primarily in the target community of Sturgis. Thus, a focus of the Assessment Grant on the target community hopes to offer job opportunities that will increase environmental health and welfare of the residents. St. Joseph County has total population of 61,136 while the target community has a population of 10,967 (Sturgis, 2011 U.S. Census Estimate). According to the 2010 U.S. Census Bureau, Sturgis had unemployment rates at 13.1%. The decline in manufacturing jobs has hurt the predominantly working-class citizens, who are finding it increasingly harder to find jobs and support their families. Between 2009 and 2012 there were over 1,500 manufacturing jobs lost in St. Joseph County (Michigan Department of Technology, Management and Budget) due to the declining economy from major employers such as; Morgan Olson, Penguin Inc. LLC, and Sturgis Iron and Metals – all of which are located in the project area. St. Joseph County's second largest employer, American Axle, forced layoffs on employees causing even more people out of jobs and shifting poverty rates. The Worker Adjustment and Retraining Notification (WARN) Data *just for these four layoff events* indicate a net loss of 1,249 manufacturing jobs in a 13-month time period, having an immediate impact on 2% of the total population of the County. We are aware of many other smaller layoff events, particularly from vendors and suppliers that relied on these large manufacturers to support their businesses. The loss of these high-paying jobs has a dramatic effect on a small rural County. The secondary impacts to suppliers, vendors, service providers, retailers, restaurants, etc. was swift and harsh. Many of the inventoried sites in the project area are vacant as a result of these secondary impacts to the local economy from plant closings (e.g., former restaurants, retail locations, and automotive repair facilities). According to 2010 U.S. Census and the 2010 American Community Survey, the target community has higher poverty rates and lower income levels than State and National levels.

In addition to the economic distress in Michigan and our local economy, the State programs to support brownfield redevelopment continue to shrink and are less and less available to small cities such as Sturgis and rural counties such as St. Joseph. The State of Michigan has nearly depleted previously well-funded state-wide programs to provide capital for environmental assessment and brownfield redevelopment. Remaining funds are extremely competitive and often allocated to larger communities such as Detroit and Flint.

These financial impacts prevent St. Joseph County from allocating funds to assess properties and assist in their redevelopment. We have estimated the expense of assessment for these sites to average \$15,000. Certain sites where the potential for abandoned underground storage tanks to remain in place would represent an even higher cost. These costs are not an expense that either the County or the individual cities are capable of bearing. St. Joseph County lacks financial resources to support our Brownfield Redevelopment Program. We are requesting grant funding to continue assessment on Brownfield sites in our target community to improve opportunities for economic and environmental development.

ii. Economic Effects of Brownfields

The target community is a main commercial thoroughfare and the brownfields within this community consist of vacant properties such as former gas stations, auto repair facilities, etc. scattered throughout the corridor. As these properties sit vacant, they do not contribute significant tax revenues to the City and County. At an average of \$5,000 per year in tax revenues, the lost revenue from these vacant properties is projected to be \$300,000 per year, a significant impact to a small rural community.

These properties also negatively impact the value of adjacent properties and the neighborhood. Property values in the County have declined significantly since 2008 decreasing the revenues available to local units of government from tax revenues. Total assessed value of County property decreased 3.35% (\$82 Million) from 2011 to 2012. The City of Sturgis lost assessed value of \$24 Million (8.97% decrease) – dramatically affecting the tax revenues of the County and Cities. As of 2010 the median value of owner-occupied housing units was \$92,500 in Sturgis, which is significantly lower than St. Joseph County at \$116,200 (2010 U.S. Census Data). State revenue sharing to Cities and Counties has diminished dramatically over the past four years. The County's revenues from the State were decreased by 24% from 2011 to 2012 (a net \$300,000 loss); Three Rivers (the other City in St. Joseph County) revenues were cut 34% (\$105,000 loss); and Sturgis's revenues were flat. Continued decreases are expected in FY2014. The loss in State support means operating budgets are constantly under pressure as communities fight to retain basic services, public safety, and infrastructure. The data demonstrate that the cities and County have fewer and fewer resources each year to address Brownfields in their communities. (Source: County and City budgets, County Equalization Report 2012).

The vacancies of these properties means that there is a lost employment opportunity for residents that live in the neighborhood. The service jobs that would otherwise be available and within walkable distance to the nearby workforce represent a loss of community wealth. The estimated 300 jobs that no longer exist at these vacant sites represents an estimated loss of \$6 Million in annual wages to the workforce population in the target community. If we can direct new development into this corridor, near the neighborhoods that need these jobs the most, we can restore economic opportunities to working class residents and improve the vibrancy of this commercial center and downtown area.

2. Project Description and Feasibility of Success

a. Project Description

i. Project Strategy

The County of St. Joseph is requesting a \$200,000, Community-Wide Petroleum Assessment Grant. Our project is focused on preparing the main commercial corridor in the County's largest City to support the economic growth opportunities that the City is experiencing. By improving this corridor for

commercial growth, we stem urban sprawl and focus economic growth into areas that need it most – poor neighborhoods and historic downtown areas.

This project is consistent with the County's Master Plan that has sought to balance urban economic development with St. Joseph County's strong agricultural related economy. Key to this Plan is stemming urban sprawl and protecting prime agricultural lands from development pressures. Sturgis's 2022 Plan further details community goals for the target community. One such example is the Plan goal of increasing commercial retail frontage from 50% to 75%. This would be accomplished, in part, by having infill commercial development occur at these vacant brownfields in the target community. The Sturgis 2022 Plan also provides direction and goals for achieving economic success, creating jobs, and enhancing the City center.

This project specifically targets potentially petroleum-contaminated sites located along the U.S. 12 and M-66 corridor in the downtown area of Sturgis. We have targeted 10 to 15 sites with potential or known petroleum contamination that we believe are likely eligible and where assessment would benefit redevelopment. The 10 to 15 sites that we have identified have existing infrastructure in place (i.e., utilities, street access, and reliable workforce). Of those sites, three are completely undeveloped, and have been in the spotlight for redevelopment. Redevelopment options such as restaurants, grocery stores, residential and office space are all feasible in the **target area**. We have evaluated the feasibility of these developments occurring within the target community by evaluating construction costs, workforce availability, traffic patterns and available infrastructure, and other factors. For example, average construction cost of a restaurant in Kalamazoo, Michigan (similar market) is \$205.00 a square foot, such that a 3,000 square foot building may cost \$615,000 (R.S. Means Construction Data, 2013). These costs are highly feasible and marketable in the target community. We already have strong developer interest. For example, two separate and significant development opportunities in the target community are being evaluated. One developer is looking to acquire a three-story parcel to be used as residential lofts, a club (upper level), restaurant (middle level) and retail (bottom level). This development would result in an investment of approximately \$1.5 Million based on square footage projection. Another restaurant developer is working with the City of Sturgis to acquire a parcel that has been identified through our site inventory, to develop an upper-scale restaurant.

Our **specific project goal** is to redevelop economically distressed and blighted properties within the target area; to leverage investment, leverage job creation, remove undesirable property conditions, improve environmental evaluation and condition of the sites, and enhance the tax base of the County; thereby ensuring a healthy and sustainable community. We have developed specific objectives to execute this project including community engagement to allow properties owners, neighbors, community leaders and potential developers to understand the overall objectives, securing public input, further prioritization of the targeted sites, determining eligibility, securing access, identifying technical needs, identifying resources to leverage development potential and completing technical assessment and cleanup planning activities.

We expect the outcomes of this project to include investment on 10 -15 properties, creation of 5-10 jobs at each project site, restoration of tax revenue, and improvements to the environmental, health and welfare of nearby residents. If successful this project would generate \$7 to \$10 million in new investment, a minimum of 120 new jobs, new total wages of \$2.5 - \$3.0 million annually, and add \$150,000 annually to local coffers through new tax revenues. We expect to **outputs** to include a Phase I Environmental Site Assessment (ESA) compliant with All Appropriate Inquiry and American Society for Testing and Materials (ASTM) Standards. Phase II ESAs including soil, groundwater, and vapor intrusion investigations will be needed to provide data that can be used to plan property re-use, identify cleanup needs, identify institutional and engineering controls to protect the public and the environment, and assisting in securing liability protection. BEAs and Due Care Plans are required components under the Michigan law to secure

liability protection. Certain properties may require surveys for asbestos containing materials, lead or other hazardous materials.

ii. Project Management Approach

The project will be implemented by the County's Brownfield Redevelopment Authority which provides the necessary oversight and staffing. This group will immediately seek to procure a Qualified Environmental Professional (QEP) through a competitive process. The site selection process has been developed and is in place with application forms, a Scoring System, and a public evaluation process through the Brownfield Redevelopment Authority. Individual projects are evaluated for their feasibility of success, consistency with community planning, and other factors. To fully utilize grant funds and complete the Project within three years, we estimate that five projects per year would be completed – which we believe to be realistic.

iii. Site Selection

The County completed a completed a Brownfield Inventory within the Targeted Community and identified over 60 sites where petroleum contamination may be present. These sites were identified using historic Sanborn Fire Insurance Maps, historic aerial photographs, and by evaluating previous uses. **Priority will be given to assessment of development-ready projects within the target area** with specific and feasible development plans. The County will evaluate ownership issues, state and federal liability, likely contaminant sources, to determine which sites are eligible for support with grant funds. Sites selected for assessment are nominated by developers ready to invest on individual sites. Nomination and evaluation forms are used by the Brownfield Redevelopment Authority to evaluate sites to select for assessment grant funding. Site access will be provided by interested developers through their Purchase Agreements and/or Access Agreements.

b. Task Description

b. Budget, Tracking and Measuring Progress, and Leveraging Other Resources

Petroleum Budget	Project Tasks					
	Budget Categories	Task 1: Phase I ESAs	Task 2: Phase II ESAs, BEAs	Task 3: Brownfield Plans and Due Care Plans	Task 4: Community Outreach, Programmatic Expenses and Travel	Leveraged Funds Grant Total
	Personnel					\$18,000 \$0
	Travel ¹					
	Equipment ²					
	Supplies					\$7,500 \$0
	Contractual ³	\$30,000	\$150,000	\$16,000	\$4,000	\$200,000
	Total	\$30,000	\$150,000	\$16,000	\$4,000	\$200,000

Task 1: Phase I Environmental Site Assessments: \$30,000

This task will involve the completion of Phase I ESAs following ASTM and all Appropriate Inquiry Standards utilizing a qualified environmental consultant. The budget estimates 12 Phase I ESAs at an average cost of \$2,500 each. Six sites have been targeted in Sturgis and six have been targeted in Three Rivers for assessment.

Task 2: Phase II Environmental Site Assessments and Baseline Environmental Assessments \$150,000

Conduct Phase II ESAs at identified petroleum related sites following ASTM standards using a qualified environmental consultant. For selected sites with appropriate levels of contamination, BEAs will be completed for liability protection, following MDEQ guidance and utilizing a qualified environmental consultant. This task will also include preparation of a Quality Assurance Project Plan, Sampling Plans and development of Health and Safety Plans. The budget assumes 12 Phase II ESAs will be completed (including BEAs) at an average cost of \$12,500 each.

Task 3: Brownfield Redevelopment Plans and Due Care Plans: \$16,000

Prepare Brownfield Redevelopment Plans to use tax increment financing strategies – allowing the Authority to capture additional tax revenue from development to pay for demolition and environmental costs associated with redevelopment. These plans would be reviewed by the County and recommended for adoption by the St. Joseph County Board of Commissioners following a public hearing. Act 381 and Michigan Economic Growth Authority (MEGA) Work Plans may be prepared for review and approval by the MDEQ and Michigan Strategic Fund. Cleanup planning or Due Care plans may encompass feasibility reviews and site control alternatives. Funds within this task may also be used in efforts to secure leveraged funds or support from the MDEQ, and Michigan Strategic Fund, and other programs and agencies that can support the redevelopment. \$16,000 is allocated to support these activities.

Task 4: Community Outreach and Programmatic Expenses: \$4,000

- This task involves activities related to community outreach including:
- Preparing for, attending and participating in public hearings, municipal meetings at townships, villages, and cities, within the County, County BRA and Commission Meeting
- Reviewing various plans including Brownfield Plans, Work Plans, and Report Recommendations
- Creating and disseminating brochures (English/Spanish) about the Brownfield Grant, outputs and outcomes and specific project updates
- Educating and informing community groups, realtors, developers, and interested parties about the Grant and benefits of the Brownfield Redevelopment. Hosting community sessions to communicate redevelopment progress and secure input for equitable and sustainable development outcomes. We would desire to partner with the Technical Assistance for Brownfield Communities (TAB) program to assist in this endeavor.

Leverage Funds: \$25,500

Various Community-Based organizations have provided support for personnel cost, technical support, meeting space, and offer to disseminate information via newspaper, flyer, and social media networks.

c. Ability to Leverage

St. Joseph County and the City of Sturgis will seek funding from a variety of viable resources to leverage the Assessment Grant monies. The Michigan Strategic Fund Community Redevelopment Program provides grant and loan funds to pay for demolitions, asbestos abatement, infrastructure, and other site improvements. These funds are extremely competitive and the amount funding is need-based. The State of Michigan intends to establish a Brownfield Revolving Loan Fund to provide loans for cleanup and assessment activities. If established, we will seek to understand where that program can leverage the assessment grant.

The County can also work in partnership with the cities to utilize funding from Community Development Block Grant funds through the HOME and Blight Elimination programs, HUD Neighborhood Stabilization Program (NSP) funds, and other federal funds that pass through city governments. For example, in late 2013, the City of Sturgis successfully pursued Community Development Block Grant funding from the Michigan Economic Development Corporation (MEDC) dedicated to blight elimination. The property that the City intends to demolish is located at the west end of the **target area** and operated as the Wood Motel since at least 1959. The Wood Motel is a vacant and blighted structure and there are two

identified potential heating oil tanks on the site. Cost of demolition and related activities are estimated to cost \$150,000. The City was able to leverage \$90,000 in funding from the MEDC and the City provided the remaining balance. This is an example of a site in the target community where Assessment Grant funds could assist the City's burden and leverage additional State and federal funds.

The County may also seek leveraged support from the Sturgis Area Community Foundation for projects that include a focus on the Foundation's priorities. The Foundation's priorities include projects that enhance core community areas, provide cultural and recreational improvements, protect and restore green spaces, and they have supported several projects of this nature. The Foundation's area of service is not limited to the City of Sturgis - their support is available throughout the County. Available funding levels vary per project, usually applied in a manner to fill financial gaps for certain project components.

Where brownfield tax increment financing (TIF) can be employed, the County will evaluate such options aggressively. Under Michigan law, this can include capture of the tax increment for five years in a local site remediation revolving fund which can be used to support a variety of brownfield redevelopment activities across the County. Thus, the grant monies would act as seed money to leverage future assessment and cleanup activities. However, these funds are available to the Authority only after development occurs and after any private entities are reimbursed. Thus, it takes many years to build a fund that is a viable resource and St. Joseph County has not yet been able to build this fund to a useful capacity to address our needs.

Where there is program and site overlap, funding may be leveraged through U.S. Economic Development Administration (EDA) funds, Transportation Enhancement grants through Michigan Department of Transportation (MDOT), Michigan State Housing Development Authority (MSHDA) programs for downtown residential projects, and other programs. For assistance in the Cleanup Planning, we will seek assistance from the TAB programs to help engage the public.

Staff is provided by a contract through Southwest Michigan First (SWMF). SWMF has a contract relationship with St. Joseph County to provide economic development services. As part of this contract SWMF staffs the Brownfield program in St. Joseph County and would manage this grant. Through the contract, SWMF is able to provide space to host meetings and community outreach events, supplies and distribution of materials, and other support services. These services represent an average monthly commitment of 10-15 hours. At \$35/hour this represents a leveraged resource of approximately \$18,000 to help manage the program. Glen Oaks Community College will provide meeting space, support staff, copying services, and office supplies to the project as needed – estimated to be up to \$7,500 over the life of the grant. Thus, through these arrangements, we are able to fully utilize this grant for contractual field assessment activities.

Additionally, the City will utilize its partnerships with the Community-Based Organization and the educational and health based organizations County Wide to leverage funding. See *Community Engagement and Partnerships*.

3. Community Engagement and Partnership

a. Plan for Involving Targeted Community and Other Stakeholders; and Communicating Project Process

It will be critical to engage the **affected community residents** and the businesses to ensure that decisions being considered by the County to address the concerns and equally, address the goals and objectives of community-wide plans. We plan two initial events (one in each City) to inform the affected communities about the Grant, Project Goals, and the desire for continuous input from the community. As the residents understand how developments benefit the community, they will be able to provide meaningful **input** and directly "buy in" to the project. The business community in the target area and County at large will also be involved to ensure they are informed of redevelopment opportunities on brownfield sites and the potential incentives through the County. The County staff work directly with various organizations. These

organizations facilitate the dissemination of redevelopment information and awareness through the community. The County will continue to promote and communicate the brownfield program through newspapers articles, website, and communications to various boards and councils. The local newspapers (the *Sturgis Journal* and the *Three Rivers Commercial News*) have a regular business article space and we have used this outlet in the past and will continue to do so to communicate benefits and successes of the program. We also engage in the *Kalamazoo-Gazette Hometown Edition* (WWMT Channel 3 CBS) radio, outlets, as well as websites and attendance at public meetings, and hearings. SWMF hosts regular business events (rotating on a quarterly basis between the two cities) and can use this platform to update the business community about the benefits of redeveloping on brownfield sites. BRA Staff also regularly interacts with the Chambers of Commerce in the two cities, annually presents to the area Realtors Association, and other business groups. In the past, staff and technical consultants have had face-to-face visits with Township Supervisors and every Village Manager to ensure that the benefits this grant can provide are made available to all areas of the County, including some of the most rural parts of the County.

Because of the sizeable Hispanic/Latin population in Sturgis, our partnership with the St. Joseph Hispanic Council facilitates **outreach to the Hispanic and Latino community** and secures reliable translation services of brochures and other updates for the Hispanic/Latino community. We can use the *Sturgis Journal* for communication as it publishes a portion of its regular publication in Spanish. Our existing communication network and our direct contact with community-based groups provides a conduit for information exchange with the affected community about brownfield redevelopment activity, and allows for community input at all phases of the grant-funded work.

In the past, we have utilized the Public Libraries in the cities to establish a repository of technical reports and presentations for specific brownfield projects. We also regularly disclose copies of environmental reports and data to the MDEQ. Thus, the findings, data and professional opinions pertaining to these properties are **readily available to the public**

B, Partnerships with Government Agencies

i. Local/State/Tribal environmental and health agencies

The County enjoys a strong active partnership with the MDEQ. MDEQ staff has a role in technical review of project outputs to ensure compliance and consistency with guidelines and regulations. These are most pertinent in complicated projects involving vapor intrusion, sites where Small Business Administration lending programs require State oversight or approval of cleanup plans. MDEQ staff assist the County in evaluating opportunities for leveraging assessment grant funds with a grant and/or loan through the State's Brownfield program. Mr. Frank Ballo (District Supervisor Remediation Division) and Mr. Mike Baranoski (Project Manager for area projects) are readily available and involved in redevelopment projects. For example, both gentlemen played a significant role in helping the County BRA secure leveraged assessment activities and State grants/loans for a large redevelopment project in Three Rivers.

The Health Department is engaged in the program and is available to review environmental data, evaluate public health impacts, and reach out to potentially impacted residences. In cases where the public is at risk through impacted private water supply wells, Steve Todd, Health Officer for the County Health Department is available to assist in evaluating data, testing and monitoring water supplies and/or communicating results to the affected community. Other federal and state programs and agencies (HUD, MSHDA, Michigan Strategic Fund, etc.) that support the County's overall redevelopment strategy play a pivotal role in the broad planning, marketing, and coordination of downtown redevelopment efforts which brings site-specific opportunities to use the Assessment Grant and obtain leveraged support.

ii. Partnerships with other relevant federal, state and local governmental agencies

Other federal and state programs and agencies include the MSHDA, United States Housing and Urban Development, and the Michigan Economic Development Authority, that support the County's overall redevelopment strategy play a pivotal role in the broad planning, marketing, and coordination of downtown

redevelopment efforts which brings site-specific opportunities to use the assessment grant and obtain leveraged support.

Where there is program and site overlap, funding may be leveraged through U.S. Economic Development Administration (EDA) funds, Transportation Enhancement grants through MDOT, Michigan State Housing Development Authority programs for downtown residential projects, and other programs. For assistance in the Cleanup Planning, we will seek assistance from the Technical Assistance for Brownfield Communities programs to help engage the public.

C. Partnerships with Community Organizations

Management of this project is done in an open meeting by the County Brownfield Redevelopment Authority which are regularly public noticed and available to the public. These meetings are held in a public building located in the target community providing easy accessibility and input opportunity to the residents of the target community. The Authority Board includes City and Village Managers, Township Supervisors, local citizens, major employers, a local utility, Public Schools and the Local Community College, small businesses and County Government. The City of Sturgis also has a strong history of involving the community and stakeholders in projects. They have routinely offered information through websites and partnered with the St. Joseph Hispanic Council to facilitate outreach to the Hispanic and Latino communities.

St. Joseph County Hispanic Council

The St. Joseph County Hispanic Council is a 501c(3) non-profit organization that is dedicated to promoting the development of the Hispanic and Latino community, generating opportunities for multicultural interaction and encouraging cooperation among culturally diverse communities. The St. Joseph Hispanic Council will provide assistance in translating and disseminating information on brownfields in Spanish and during meetings. By involving the Hispanic Community we are able to directly communicate with a sensitive population in the target area and offer connections to development opportunities for small business owners in the Hispanic/Latino community. This group has been inactive for approximately two years and views this grant as a possible source of focus for the group. Because of the group's bylaws and inactive status, the Executive Director was unable to provide a support letter for this application.

Sturgis and Three Rivers Chambers of Commerce

Both Chambers conduct retention calls and act as a conduit for leads to growing businesses that might be interested in developing on brownfield sites. Both are well versed in economic development and brownfield activities and provide another means to promote the availability of the grant.

Glen Oaks Community College

Glen Oaks Community College works closely with the County on planning and implementing strategies and programs to improve communities within St. Joseph County. Their commitment is to stimulate economic development throughout education programs. They will work to leverage the college's programs and services to complement and enhance the economic development work of the County. These services are worth an estimated \$7,500 dollars through the life of the grant.

Michigan Works!

Michigan Works! will partner with County by providing assistance to local employers for screening potential employees. They also provide this assistance for Community Development Block Grant Funding. Michigan Works! will collaborate on marketing efforts and business retention. These In-kind services are estimated at \$100,000 - \$300,000 throughout the life of the grant.

MSU Extension

Michigan State University Extension will promote the availability of the grant a part of a larger package of incentives to attract new business and companies to locate in St. Joseph County. Their reach global in nature and helps promote St. Joseph County's redevelopment Program.

Human Services Commission

The Human Services Commission (HSC) represents 17 social service agencies within the St. Joseph County. Their goal is to enhance services without duplication of efforts and to provide dissemination of information to organizations throughout the County. They assist the County in providing information about populations lacking a conduit to leadership and redevelopment activities. This board offers a wonderful communication tool for the promotion of the assessment grant.

County Health Department

The County Health Department will provide assistance with specific health related issues such as lead testing for youth and other sensitive populations, review of data to assess impact to residents and help us convey information to the public.

Sturgis Area Community Foundation

The Sturgis Area Community Foundation will support the various programs and projects associated with Brownfield Redevelopment, and will act as a resource for educational, cultural, healthcare and recreational activities.

4. Project Benefits

a. Health and/or Welfare and Environment

The project anticipates outcomes that improve the overall welfare, health and safety, environment, and economy of St. Joseph County, specifically job creation; investment in a downtown area; and a better understanding of environmental conditions at previously unassessed, vacant properties. We have worked with our partners and through previous brownfield inventories to develop a listing of 10 to 15 likely eligible former gasoline service stations near our downtown area that are vacant buildings, unused land, or underutilized buildings. We anticipate that through the grant, we will assess the majority of the properties and leverage development at more than half the sites. Such improvements would be consistent with community plans and visions for improved downtown areas. Because several of the sites have not been assessed, it is our hope that being able to provide environmental data on the sites removes the unknown status of liabilities, leading to clearer plans for cleanup and redevelopment that support this project.

The brownfields that we have identified in the target area are immediately adjacent to low-income and minority neighborhoods, adjoining a large Hispanic/Latino community. Social benefits will be realized from redevelopment of the identified Brownfield sites as development removes blighted conditions in these neighborhoods, eliminates safety hazards posed by abandoned structures, removes buildings that may harbor criminal elements, and improves the overall appearance of the City's and neighborhood's gateway. Further, it is our hope that these sites represent a potential development site for small businesses that might be owned or operated by residents in the neighborhood. Since these are small sites, they are ideal for small shops, restaurants, and service businesses that are frequently sole proprietor or family-owned. This strategy is aided by our partnership with the Chamber of Commerce who benefits potential developers and first-time business owners by providing business skills training support. Development also provides employment opportunities for neighborhood residents and since jobs are within walkable distance, such development supports livability and equitable development principals for those who due to their socio-economic status lack other means of transportation to employment opportunities. Through partnership with the Michigan Works! services, local residents looking for jobs are connect to the development opportunities supported by this grant.

Redevelopment of such properties directly reduces the public's exposure to contaminants through removal of contaminated soils, controls implemented to control vapor migration, fencing, engineered covers over contaminated soils, etc. Assessment provides better data for technical staff, MDEQ and the Health Department to evaluate public exposures and the potential migration of contamination from the identified brownfield sites. Where abandoned underground storage tanks may be identified, the removal of tanks will eliminate potential or ongoing sources of environmental contamination.

b. Environmental Benefits from Infrastructure Reuse / Sustainable Reuse

i. Using Assessment Grant funds to assess brownfield sites will provide assistance to interested parties, encouraging them to consider brownfields, which will alleviate development pressure on greenspace, protecting valuable farmland important to St. Joseph County's economy. Each of the prioritized sites in the target community would utilize existing infrastructure such as sewers, roads, etc.

We will encourage developers to consider a variety of sustainable practices in their projects. Each developer we support will be provided a package of resources and information on recycling materials in demolition, deconstruction techniques, alternative energy resources, LEED, energy audit programs, storm water management principles, the Energy Star program, and other features that help enhance the environmental benefits of the redevelopment.

ii. Example of efforts to integrate equitable development or livability principals

St. Joseph County, the County Human Services Commission, and the County Commission on Aging are working together to incorporate a Communities for Lifetime recognition awarded by the State of Michigan. St. Joseph County, will address its growing elderly/retiree population to become a more "elderly-friendly" environment. The award was based on ten community livability categories such as: walkability, access to health care, safe and secure, housing: availability and affordability, Housing: modification and maintenance, transportation, commerce, enrichment and inclusion that are an asset to St. Joseph County. The County hopes to use this recognition to leverage funding for additional **Aging Friendly and Livable Communities** projects. Assessment Grant funding could be used to assist developers in projects that support these 10 livability criteria.

c. Economic Benefits

i. Economic benefits

The primary focus of the grant on near-downtown properties will have a direct impact on economic development, job creation, and private investment in the affected community. The economic benefits are regularly tracked and with previous grants we have shown a history of positive outcomes. We expect continued success with the new assessment funds. Our past history of commercial and downtown redevelopments shows that we can expect an average investment of \$500,000 and creation of up to 10 new jobs for each development. Overall, we expect the grant to leverage \$7-10 Million in new investment and create over 120 new jobs. These investments would result in new total wages of \$2.5 - \$3.0 million annually, and add \$150,000 annually to local coffers through new tax revenues. Because these investment dollars and jobs are within walkable distance of the affected minority and low-income neighborhoods, we hope that these redevelopments benefit the affected community by providing job opportunities, business ownership opportunities, and improved value to neighboring properties.

ii. Local hiring and procurement

The County will work with its partners such as Michigan Works! to connect hiring opportunities created by the assessment activities or the redevelopment projects with local citizens and in particular, citizens within the affected neighborhoods. There are no Brownfield job training grantees in the West Michigan area.

5. Programmatic Capability and Past Performance

a. Programmatic Capability

If awarded, the County will staff the management of this grant through its contractual relationship with Southwest Michigan First. The assigned local staff would include Project Director Cathy Knapp. Ms. Knapp has over 20 years of experience, with expertise in economic development, communications, marketing, and municipal government. Ms. Knapp previously served as the St. Joseph County Economic Development Corporation's Executive Director, and has successfully managed three U.S. EPA Assessment Grants. County staff from various departments supports the team by providing historical resources, aerial photography, GIS data, utility information, etc. The County has also established relationships to secure technical expertise for brownfield projects. Through the contract SWMF is able to provide support

personnel, space to host meetings and community outreach events, supplies and distribution of materials, and other support services. Thus, through this arrangement, we are able to fully utilize this grant for contractual field assessment activities.

Additionally, the County has two private consulting firms under contract to access technical expertise beyond that provided by the County and MDEQ. These consultants offer a wide range of technical service, experience and business acumen to assist in a successful Brownfield Program. These professional services will be acquired in compliance with 40 CFR 30, 31, and 33 requirements as applicable. In the event of staff turnover, Jill Bland of SWMF would be the successors. Jill work closely with Cathy throughout the County on a number of economic development projects including projects utilizing brownfield redevelopment programs and/or the U.S. EPA Assessment Grant. The sitting Board President at the time would also play an increased role in managing the grant expenditures.

b. Audit Findings

The County has a long history of managing federal funds, and there have never been any adverse audit findings as related to OMB Circular A-133, nor is the County required to comply with "high risk" terms and conditions OMB Circular 102.

c. Past Performance and Accomplishments

St. Joseph County, Michigan has not previously received a U.S. EPA Brownfield Grant. However, the St. Joseph County staff members have successfully managed other assistance agreements awarded to St. Joseph County over the years. The County has extensive experience managing other federal and non-federal assistance agreements.

1. Purpose and Accomplishments

Some of the highlights of previous federal and non-federal assistance include:

2008 & 2009 US Department of Homeland Security State Domestic Preparedness Funds

St. Joseph County was received 2008 and 2009 State Domestic Preparedness funds through the US Department of Homeland Security. In fiscal year 2011, the total funding amounted to \$105,584. The funds were used to enhance the County's ability to respond to terrorist attacks.

2011 Emergency Management Performance Grant

In 2011, St. Joseph County was awarded \$18,324 through a US Department of Homeland Security Emergency Management Performance Grant. The funds were used to prepare the County for potential hazards and provide a system of emergency preparedness for protection of life and property.

2010 Department of Energy, Labor & Economic Growth Energy Efficiency & Conservation Block Grant

St. Joseph County was awarded \$277,664 to install a solar electric system and solar hot water system at the St. Joseph County Jail. Other activities included upgraded lighting for efficiency and the creation of an Energy Fund from the savings to be used for future energy saving projects. The project was completed in 2011.

FY2011 US Department of Health and Human Services Grants

In fiscal year 2011, St. Joseph County managed \$277,664.00 in funding from the US Department of Health and Human Services to successfully administer programs for home delivered meals, caregiver support, and disease prevention for the aging.

2. Compliance with grant requirements

All aspects of the above grant requirements have been completed without delays and achieved the desired goals. The County complied with the various grant guidelines and requirements, including timely reporting, quarterly updates, disseminating outcomes to the public and funding agency.

We intend to fully respect the requirements as designated by the U.S. EPA and have programmatic staff support that has successfully managed, implemented and tracked previous U.S. EPA Assessment Grants in the past. We recognize reporting requirements such as Quarterly Report and annual financial

reports. We recognize the importance of regularly reporting incremental progress in desired outcomes through maintaining ACRES data and disseminating information to the community.

Attachment A – Letter from the State



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

January 16, 2014

Mr. Patrick Yoder
County Administrator
St. Joseph County
PO Box 189
Centreville, Michigan 49032

Dear Mr. Yoder:

SUBJECT: Acknowledgment Regarding the United States Environmental Protection Agency
Brownfield Assessment Grant Proposal

Thank you for your notice and request for a letter of acknowledgment for St. Joseph County's proposal to the United States Environmental Protection Agency (EPA) brownfield grant program. The Department of Environmental Quality, Remediation and Redevelopment Division (RRD), is supportive of county-based redevelopment efforts and has reviewed the information you provided regarding your proposal.

St. Joseph County is applying for a \$200,000 petroleum assessment grant which can be used to conduct assessment activities at eligible petroleum brownfield sites in the county. St. Joseph County is considered eligible for this grant as a general purpose unit of local government.

Should the EPA award this brownfield grant to St. Joseph County, it would promote redevelopment and reuse of underutilized and contaminated properties and improve the economic development and environmental conditions in the county. If you need further information or assistance regarding specific brownfield sites, please contact Mr. Ron Smedley, Brownfield Redevelopment Coordinator, RRD, at 517-284-5153, or you may contact me.

Sincerely,

Carrie Geyer, Chief
Brownfield Redevelopment Unit
Program Support Section
Remediation and Redevelopment Division
517-284-5182

cc: Ms. Linda Mangrum USEPA Region 5
Ms. Cathy Knapp, Southwest Michigan First
Mr. Ron Smedley, DEQ

Attachment B – Threshold Criteria

Threshold Criteria for Assessment Grant

Applicant – St. Joseph County (County), Michigan

1. Applicant Eligibility

St. Joseph County is a local purpose unit of government.

2. Letter from the State of Michigan

The County received a letter from the Michigan Department of Environmental Quality (MDEQ) acknowledging the County's plan to conduct assessment activities through the pursuit of Federal grant funds. Please refer to attached letter.

3. Community Involvement

It will be critical to engage the **affected community residents** and the businesses to ensure that decisions being considered by the County to address the concerns and equally, address the goals and objectives of community-wide plans. We plan two initial events (one in each City) to inform the affected communities about the Grant, Project Goals, and the desire for continuous input from the community. As the residents understand how developments benefit the community, they will be able to provide meaningful **input** and directly "buy in" to the project. The business community in the target area and County at large will also be involved to ensure they are informed of redevelopment opportunities on brownfield sites and the potential incentives through the County. The County staff work directly with various organizations. These organizations facilitate the dissemination of redevelopment information and awareness through the community. The County will continue to promote and communicate the brownfield program through newspapers articles, website, and communications to various boards and councils. The local newspapers the *Sturgis Journal* and the *Three Rivers Commercial News* have a regular business article space and we have used this outlet in the past and will continue to do so to communicate benefits and successes of the program. We also engage in the *Kalamazoo-Gazette Hometown Edition* (WWMT Channel 3 CBS) radio, outlets, as well as websites and attendance at public meetings, and hearings. SWMF hosts regular business events (rotating on a quarterly basis between the two cities) and can use this platform to update the business community about the benefits of redeveloping on brownfield sites. BRA Staff also regularly interacts with the Chambers of Commerce in the two cities, annually presents to the area Realtors Association, and other business groups. In the past, staff and technical consultants have had face-to-face visits with Township Supervisors and every Village Manager to ensure that the benefits this grant can provide are made available to all areas of the County – including some of the most rural parts of the County.

Because of the sizeable Hispanic/Latino population in Sturgis, our partnership with the St. Joseph Hispanic Council facilitates **outreach to the Hispanic and Latino community** and secures reliable translation services of brochures and other updates for the Hispanic/Latino community. We can use the *Sturgis Journal* for communication as it publishes a portion of its regular publication in Spanish. Our existing communication network and our direct contact with community-based groups provides a conduit for information exchange with the affected community about brownfield redevelopment activity, and allows for community input at all phases of the grant-funded work.

In the past, we have utilized the Public Libraries in the cities to establish a repository of technical reports and presentations for specific brownfield projects. We also regularly disclose copies of environmental reports and data to the MDEQ. Thus, the findings, data and professional opinions pertaining to these properties are

4. Site Eligibility and Property Ownership Eligibility

Since this application is a community-wide proposal, this section is not applicable

Attachment C – Letters of Support from Community-Based Organizations



GLEN OAKS COMMUNITY COLLEGE

January 14, 2014

Mr. J. Patrick Yoder
St. Joseph County
PO Box 189
Centreville, MI 49032

Re: FY 2014 US EPA Brownfield Assessment Grant


Dear Mr. Yoder:

On behalf of Glen Oaks Community College, I am pleased to submit this letter of support for St. Joseph County in their effort to obtain brownfield assessment grant funding. The County has a successful track record in assisting businesses with start-up and expansion needs. Having the availability of brownfield assessment funds would impact the efforts of the Economic Development Corporation, our villages, townships, and cities to attract new businesses and retain existing ones. The work helps new businesses locate in zoned areas rather than rezoning valuable farmland and promotes greater reinvestment within our county.

Glen Oaks Community College partners with the County on a number of training projects. We assist the St. Joseph County Brownfield Redevelopment Authority on planning and implementing strategies to improve the communities that make up St. Joseph County. Our commitment is to stimulate economic development throughout our academic programs. We work to leverage the college's programs and services to complement and enhance the economic development work of organizations in the county. Glen Oaks services equate to approximately \$7,500 in funding that will be provided through in kind services. The College has been pleased with how the County has worked with administration of prior federally funded programs.

I strongly urge your support for this grant request.

Sincerely,


Dr. Gary S. Wheeler
President



A Private-Public Partnership Serving Kalamazoo and St. Joseph Counties
222 S. Westnedge Avenue, Kalamazoo, Michigan 49007-4628

January 16, 2014

Mr. J. Patrick Yoder
St. Joseph County
PO Box 189
Centreville, MI 49032

Re: FY 2014 US EPA Brownfield Assessment Grant

Dear Mr. Yoder:

Michigan Works! is pleased to partner with St. Joseph County on its Brownfield Assessment Grant Application. Karen Carlisle, Director of Youth Opportunities Unlimited, contractor for our Employment Services, One-Stop, and Youth Michigan Works! programs currently works with Brownfield sites in the County through the Brownfield Redevelopment Authority. The job creation and employee training missions of Michigan Works! are compatible with the economic growth and brownfield redevelopment. We will continue to offer our assistance to companies using your assessment grants to help keep our local businesses competitive.

We intend to support your efforts and partner with you by continuing to be a part of your organization from a board standpoint as well as collaborating on marketing efforts and business retention efforts. Michigan Works! Business Services Team will continue to offer the assistance of screening resumes and applications for employers. Michigan Works! will also offer our value added business service proposals, on the job training, education grant dollars, and offering any other services that are available as incentives to assist local business growth. These in-kind services are worth on an average from approximately \$100,000 to \$300,000. The exact amount will vary depending on the specific project and services. Michigan Works! looks forward to all of our current and future partnerships with you on retention efforts for local businesses in our communities.

Sincerely,

Ben Damerow
Director, Michigan Works!
Kalamazoo & St. Joseph Counties

KALAMAZOO COUNTY

(269) 349-1533 FAX (269) 349-5505

(269) 273-2717

ST. JOSEPH COUNTY

FAX (269) 273-3002

An equal opportunity employer / program supported by the State of Michigan. 1-800-285-WORK (9675).
Auxiliary aids and services are available upon request to individuals with disabilities - Michigan Relay Center 1-800-649-3777 (Voice and TTY).

MICHIGAN STATE
UNIVERSITY

Extension

January 14, 2014

Mr. J. Patrick Yoder
St. Joseph County
PO Box 189
Centreville, MI 49032

Re: US EPA Brownfield Assessment Grant

Dear Mr. Yoder:

St. Joseph County Michigan State University (MSU) Extension office is pleased to support St. Joseph County's efforts to pursue a US EPA Brownfield Assessment Grant.

MSU Extension is committed to bringing education programs and research to the people of this county that helps improve their lives and communities. We believe brownfield redevelopment in St. Joseph County will enhance communities by reducing environmental and public health risks and creating economic activity.

As a result, St. Joseph County MSU Extension office will gladly be supportive of this effort and is prepared to provide the County with space for educational programming, enabling community members to learn about brownfield sites and what is being done to address them, how the properties can get back on the tax roll, and visioning sessions for the sites.

We look forward to working with the County to support brownfield redevelopment in St. Joseph County. If you have questions, please do not hesitate to contact me at (269) 467-5646.



MSU Extension

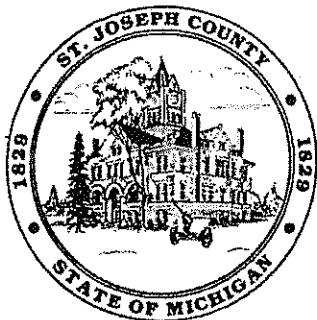
St. Joseph County
612 E. Main Street
Centreville, MI 49032-9627

Phone: 269-467-5511

Fax: 269-467-5641

Sincerely,

Dean Baas, PhD
Senior Research Associate
Ag and Agribusiness Institute
Michigan State University Extension
612 E. Main Street
Centreville, MI 49032
Phone: 269-467-5646 (office)
Phone: 269-967-9672 (cell)
Email: baasdean@anr.msu.edu



ST. JOSEPH COUNTY HUMAN SERVICES COMMISSION

692 E. MAIN • CENTREVILLE, MI 49032

Telephone: (269) 467-1223
Fax: (269) 467-4012

January 14, 2014

Mr. J. Patrick Yoder
St. Joseph County
PO Box 189
Centreville, MI 49032

Re: US EPA Brownfield Assessment Grant Proposal for St. Joseph County

Dear Mr. Yoder:

The St. Joseph Human Services Commission (HSC) would like to support the St. Joseph County in their application for Brownfield Assessment funds. We believe that a strong local economy is tied to a healthy community, and having the ability and funding to better understand some of the problem sites in the community can contribute to that. The assessment of the Brownfield sites assists in redevelopment of properties with known and perceived contamination; usually resulting in the development of abandoned or underutilized property. Some of the hardest hit communities are disproportionately surrounded by sites of contamination and low-income/minority neighborhoods. These projects contribute the economic development potential in the community by creating jobs, improving housing, encouraging private investment, and understanding environmental issues.

The HSC was established to give local control of state funding for families with children and to increase the efficiency of existing governmental bodies. The HSC forges alliances, creates shared visions, and mobilizes resources to serve families whose needs are met by multiple agencies. We assist families in accessing services to help make them healthy, productive, and contributing members of the community.

The HSC is submitting its letter of support on behalf of the seventeen partnering organizations that make up this multi-purpose collaborative group. We feel the grant award would impact each organization by improving the community neighborhoods and economy.

Sincerely,

Anita Lopez Schlabach
Collaborative Coordinator

Working Collaboratively

Commission on Aging, Community Mental Health, County Commissioners, County Prosecutor, District Health Department, Domestic Assault Shelter Coalition, Family Independence Agency, Glen Oaks Community College, Intermediate School District, K-12 Superintendents Association, MSU Extension, Probate / Juvenile Court, Michiana Addictions & Prevention Services, Michigan Works / Upjohn Institute and Citizen Representatives



"Your Local
Health Department"

Branch - Hillsdale - St. Joseph Community Health Agency

570 N. Marshall Road
Coldwater, MI 49036
(517) 279-9561

Fax (517) 278-2923

20 Care Drive
Hillsdale, MI 49242
(517) 437-7395
1-888-544-7395

Fax (517) 437-0166

www.bhsj.org

1110 Hill Street
Three Rivers, MI 49093
(269) 273-2161
1-800-258-1092
Fax (269) 273-2452

January 14, 2014

Mr. J. Patrick Yoder
St. Joseph County
PO Box 189
Centreville, MI 49032

Re: US EPA Brownfield Assessment Grant Proposal for St. Joseph County

Dear Mr. Yoder:

The Branch-Hillsdale-St. Joseph Community Health Agency is pleased to offer its support for the US EPA Brownfield Assessment Grant Proposal from St. Joseph County. The assessment grant is complementary to our investments through environmental protection programs and community outreach services.

Our investment in the community will offer a variety of environmental protection programs and has the ability to implement health and safety programs in the community as part of our Community Outreach Services. We will also be able to keep the community educated on improvements to public health due to a better understanding of the environmental health threats in the community.

The Community Health Agency will support the efforts of St. Joseph County by reviewing data pertinent to public health exposures as well as offering a means to communicate data about Brownfields to the community. We will be able to provide environmental and educational services to the St. Joseph County government. We look forward to another successful partnership that will benefit the community.

Sincerely,

Rebecca A. Burns, MPH, RS
Director of Environmental Health

cc: Stephen R. Todd, MPA, RS, Health Officer, Branch-Hillsdale-St. Joseph Community Health Agency

Sturgis Area Community Foundation

310 N. Franks Ave. • Sturgis, MI 49091 • (269) 659-8508 • Fax (269) 659-4539 • E-mail sacf@sturgisfoundation.org
www.sturgisfoundation.org

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Robert Coyne, 1962-80
Mary Dresser, 2004-05
Leonard Eichen, 1990-01
George Field, 1980-89
Lawrence Franks, 1993-95
George Freeman, 1962-67
Richard Freeman, 1967-92
James Goethals, 1991-05
Ray Kimball, 1962-82
Thomas Kool, 2000-09
Charles Kirsch, 1971-85
Bobette Melichi, 1994-2003
Kelly Murphy, 2002-2011
Jeff Phillips MD, 2009-2011
Carl "Pete" Behm, 1982-93
Sheila Riley, 1998-08
Eli Shaheen, 1962-91
John Sheldon, MD, 1962-71
John Wiedlea, 1984-99

Youth Trustee
Kelsi Caywood, 2011-2013
Ella Inman, 2010-12
Chelsea Leav, 2008-10
Tyler Luce, 2009-11
Brennan McConnell, 2011-2013
Lauren Sproul, 2007-09



Confirmed in Compliance
with National Standards

January 14, 2014

Mr. J. Patrick Yoder
St. Joseph County
PO Box 189
Centreville, MI 49032

Re: US EPA Brownfield Assessment Grant Proposal for St. Joseph County

Dear Mr. Yoder:

The Sturgis Area Community Foundation strongly supports the application from St. Joseph County for an EPA Brownfield Assessment Grant. Our Foundation focuses on supporting high-impact opportunities that will make the greatest difference in our community. We feel that the Brownfield Assessment Grant is a powerful tool toward the economic development efforts in the area. Economic growth leads to our goal of improved quality of life for the community and region.

Over the past five years, the Foundation has averaged over \$300,000 per year to the community through grants and scholarships. Nearly 2000 different programs have been supported by the foundation, assisting in the process over 100 different organizations. Foundation grants support the area homeless as well as arts and culture, community well-being, health and recreation, scholarship funds, youth, education, and economic development projects.

The Sturgis Area Community Foundation has built strong relationships with the City of Sturgis and St. Joseph County leaders and fully supports the application for the Brownfield Assessment Funding. Our community is at a tipping point, and the \$400,000 in funding would provide a push toward improved neighborhoods, quality of life, and economic growth.

Sincerely,

Mary Dresser
Co-Director

John Wiedlea
Co-Director



Michael A. Finney
President and CEO

EXECUTIVE COMMITTEE

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Chair
Business Leaders for Michigan

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Vice Chair
Whirlpool Corporation

Lizabeth Ardisana
ASG Renaissance

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Mary Lou Benecke
Dow Corning Corporation
Retired

John W. Brown
Stryker Corporation

Robert Collier
Council of Michigan Foundations

Stephen D'Arcy
Quantum Group LLC

Stephen Forrest
University of Michigan

Paul Hillegonds
DTE Energy

Chris MacInnes
Crystal Mountain Resort & Spa

Jeff Metts
Dowling Industries, Inc.

Greg Northrup
West Michigan Strategic Alliance

John Rakolta, Jr.
Walbridge

Chris Rizik
Renaissance Venture Capital Fund

Anmar Sarafa
Steward Capital Management

Marilyn Schlack
Kalamazoo Valley
Community College

David Sowerby
Loomis, Sayles & Company

Dayne Walling
City of Flint

January 16, 2014

Ms. Deborah Orr
U.S. Environmental Protection Agency (EPA), Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-5307

Dear Ms. Orr:

The Michigan Economic Development Corporation (MEDC) would like to express its support for St. Joseph County's U.S. EPA Brownfield Assessment Grant application. The EPA's assistance has provided communities throughout the state with the Brownfield cleanup and redevelopment resources needed to reinvigorate communities, mitigate health and environmental hazards, and address long-standing environmental issues associated with our Brownfield sites. The EPA has been a valued partner in Michigan's efforts to turn blighted, contaminated properties into nationally recognized Brownfield redevelopments.

EPA Brownfield Assessment funding provides critical initial information regarding the environmental condition of suspected Brownfield properties and helps to position property for redevelopment. Once development proposals are presented, local brownfield redevelopment authorities, the Michigan Department of Environmental Quality and the MEDC review plans for reimbursement from future property tax revenues generated by new investment.

The MEDC and St. Joseph County are currently cooperating on a number of Brownfield projects. We look forward to continued cooperation with additional projects brought forward by St. Joseph County through the EPA Brownfield Assessment Grant and other sources. We encourage the EPA to review this application and give it full consideration as it works to distribute funds through this program.

Sincerely,

Michael A. Finney
President and CEO

Cc: J. Patrick Yoder, St. Joseph County

Michigan Economic Development Corporation

300 North Washington Square | Lansing, MI 48913 | 888.522.0103 | MichiganAdvantage.org | michigan.org

Attachment D – Other Factors Checklist

Appendix 3

Other Factors Checklist

Name of Applicant: St. Joseph County Government

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

- ☐ Community population is 10,000 or less
- ☐ Federally recognized Indian tribe
- ☐ United States territory
- ☐ Applicant will assist a Tribe or territory
- ☐ Targeted brownfield sites are impacted by mine-scarred land
- ☐ Targeted brownfield sites are contaminated with controlled substances
- ☐ Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress.
- ☒ Project is primarily focusing on Phase II assessments – **Page #10**
Continuing assessment grant funding will utilize 75% or \$150,000 from the total (\$200,000) budget on twelve (12) Phase II Environmental Site Assessments.
- ☐ Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.
- ☒ Community experiencing plant closures (or other significant economic disruptions) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant closures due to bankruptcy or economic disruptions. – **Page # 5-6 see also attached WARN Data Documentation.**
- ☐ Recent (2008 or later) significant economic disruption (unrelated to a natural disaster or manufacturing/auto plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.
- ☐ Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant that is directly tied to the project area, and can demonstrate that funding from a PSC grant has or will benefit the project area. To be considered, **applicant must attach documentation** which demonstrates this connection to a HUD-DOT-EPA PSC grant.
- ☐ Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant
- ☐ Community is implementing green remediation plans.
- ☐ Climate Change (also add to “V.D. Other Factors”)

St. Joseph County Brownfield Redevelopment Authority*				
Sturgis				
Company Name	City	Date Received	Incident Type	Number of Layoffs
Morgan Olson	Sturgis	2/10/2009	Mass Layoff	176
Penguin Inc. LLC	Sturgis	3/13/2009	Mass Layoff	150
Sturgis Iron and Metal	Sturgis	4/21/2008	Plant Closing	573
Three Rivers				
Company Name	City	Date Received	Incident Type	Number of Layoffs
American Axle	Three Rivers	5/11/2009	Mass Layoff	350

*Michigan Department of Technology, Management and Budget

WARN (Worker Adjustment and Retraining Notification) Data from 01/01/2009-01/14/2014

Plant closing: A covered employer must give notice if an employment site (or one or more facilities or operating units within an employment site) will be shut down and the shutdown will result in an employment loss* for 50 or more employees during any 30-day period.

Mass layoff: A covered employer must give notice if there is to be a mass layoff which does not result from a business closing, but will result in an employment loss* at the employment site during any 30-day period for 500 or more employees, or for 50-499 employees if they make up at least 33% of the employer's active workforce.